

DOCKETED
FILED
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION
JUN 15 PM 12 31
CLERK
U.S. DISTRICT COURT

BALLY MANUFACTURING CORPORATION,)
)
Plaintiff,)
)
v.)
)
D. GOTTLIEB & CO. and)
WILLIAMS ELECTRONICS, INC.,)
)
Defendant.)

CIVIL ACTION NO. 78 C 2246

DEFENDANT'S FIRST INTERROGATORY
TO PLAINTIFF

Defendant, Williams Electronics, Inc., requires plaintiff, Bally Manufacturing Corporation and its subsidiaries (hereinafter Bally), to answer under oath the following interrogatory in accordance with the provisions of Rule 33 of the Federal Rules of Civil Procedure.

Definition of Terms

A. In the following interrogatories, "plaintiff" means the plaintiff herein, Bally Manufacturing Corporation and its subsidiaries, and this term is meant to include all officers, directors, managing agents, employees (to the extent of their activities relating to the business affairs of plaintiff), and attorneys associated with said corporations, and all other persons representing and under the control of the plaintiff in this action.

B. As used herein, "person" is used in its broadest sense to include, whenever the context permits, firms, partnerships, corporations and other business organizations as well as individuals. When asked to "identify" persons, plaintiff is requested to describe each person with the certainty required for a notice of examination for deposition under Rule 30 including but not limited to the person's name and address, and in the case of a natural person, his full name, home address, business address, title, present occupation and employer.

Introduction

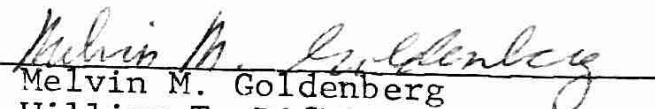
Attached to this interrogatory is detailed information regarding the processor controlled pinball games manufactured and sold by defendant Williams Electronics, Inc. This information is supplied to permit plaintiff to respond to the following interrogatory.

INTERROGATORY NO. 1. With regard to the patent in suit:

- (A) identify each and every claim thereof which plaintiff alleges is infringed by the Williams processor controlled pinball games;
- (B) apply each claim allegedly infringed, element by element, to the Williams processor controlled pinball game, specifically referring to the circuit components (as shown in the material submitted herewith or such other material as may be available

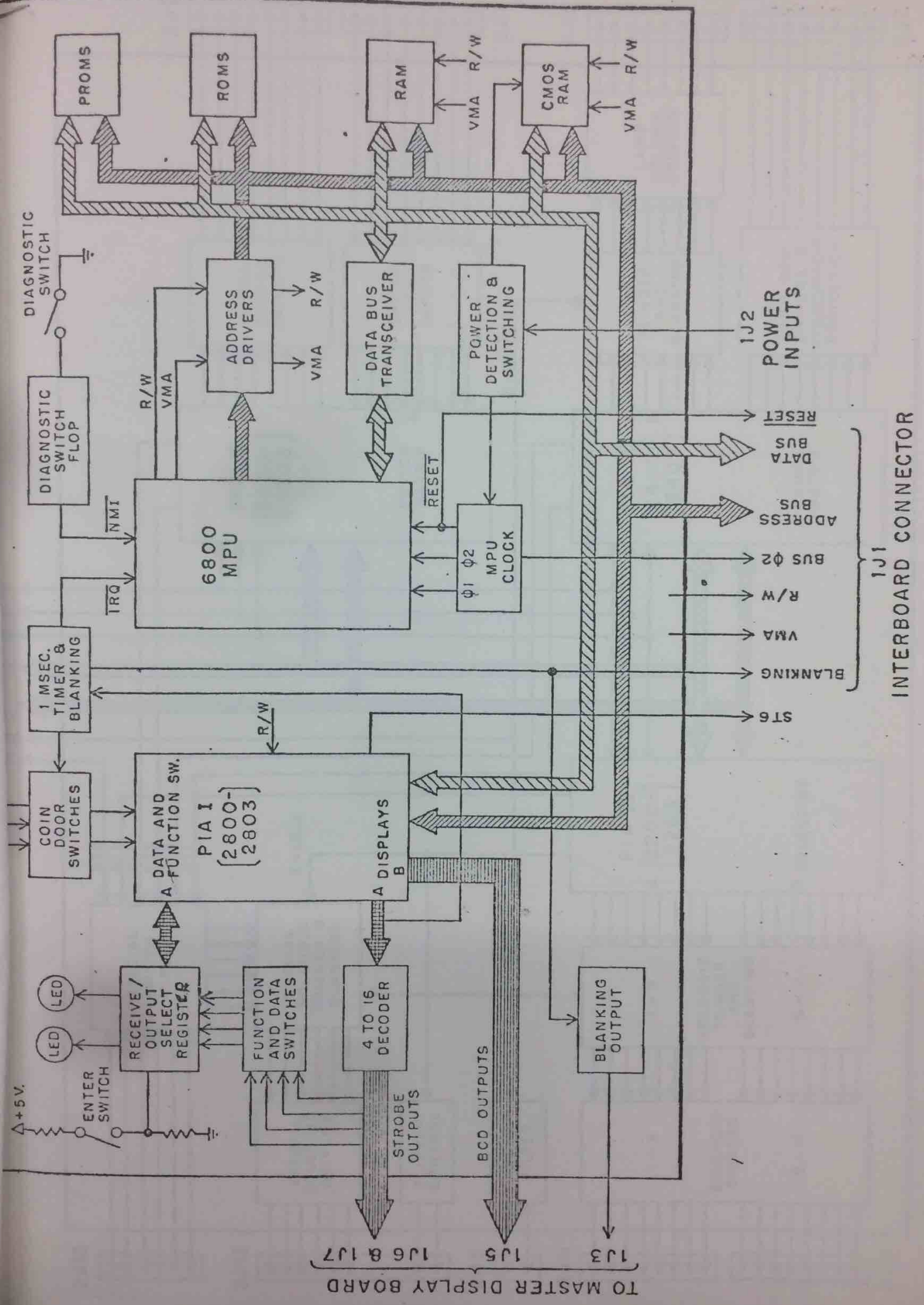
to plaintiff) which correspond to each claim element;

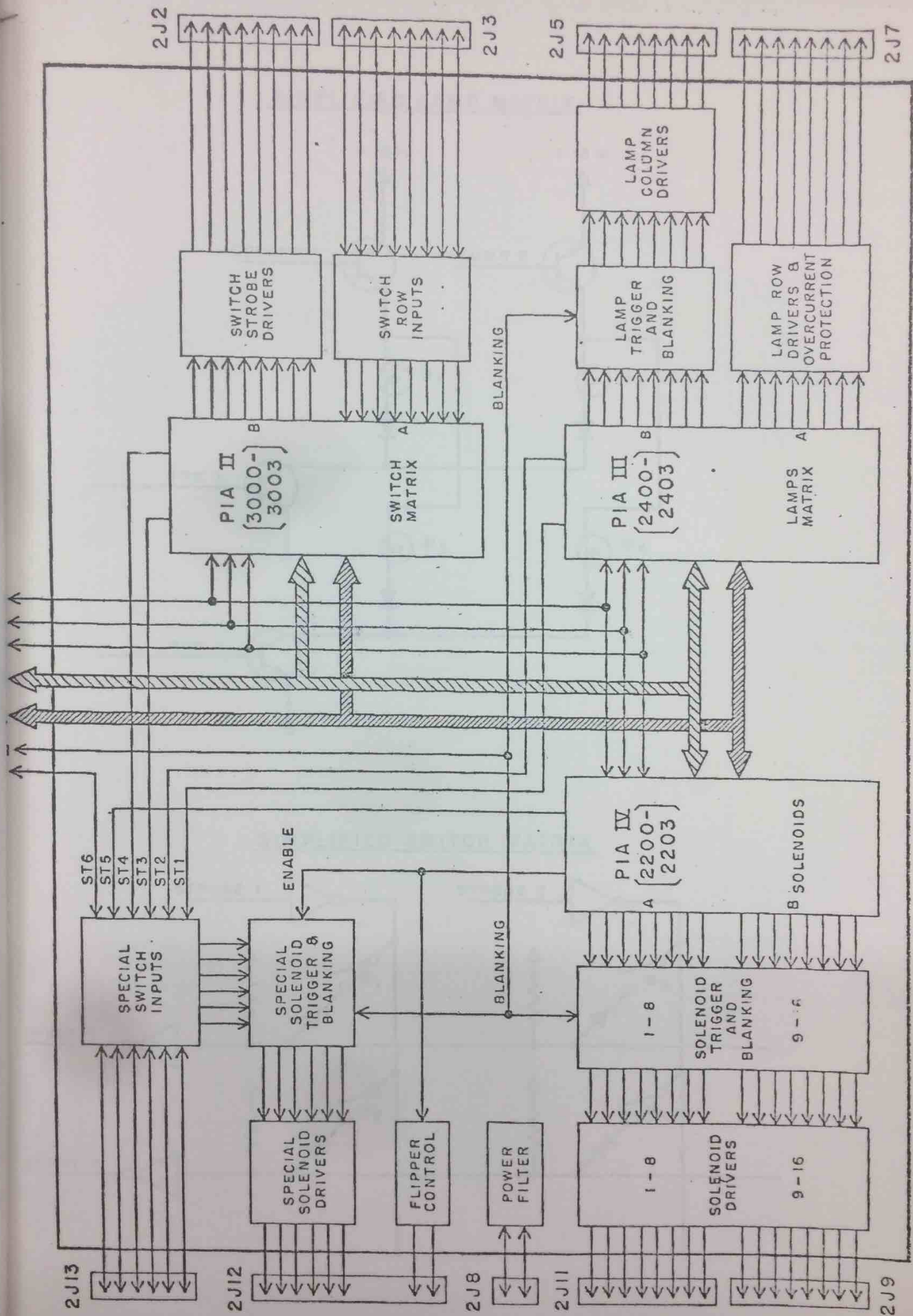
- (C) identify all persons who in any way participated in supplying the answers to this interrogatory and indicate the contribution of such person in supplying these answers;
- (D) identify all persons who are available to testify as to the subject matter of this interrogatory;
- (E) identify all documents relating to the subject matter of this interrogatory.


Melvin M. Goldenberg
William T. Rifkin
McDougall, Hersh & Scott
135 S. LaSalle Street
Chicago, Illinois 60603
(312) 346-0338
Firm ID No. 323

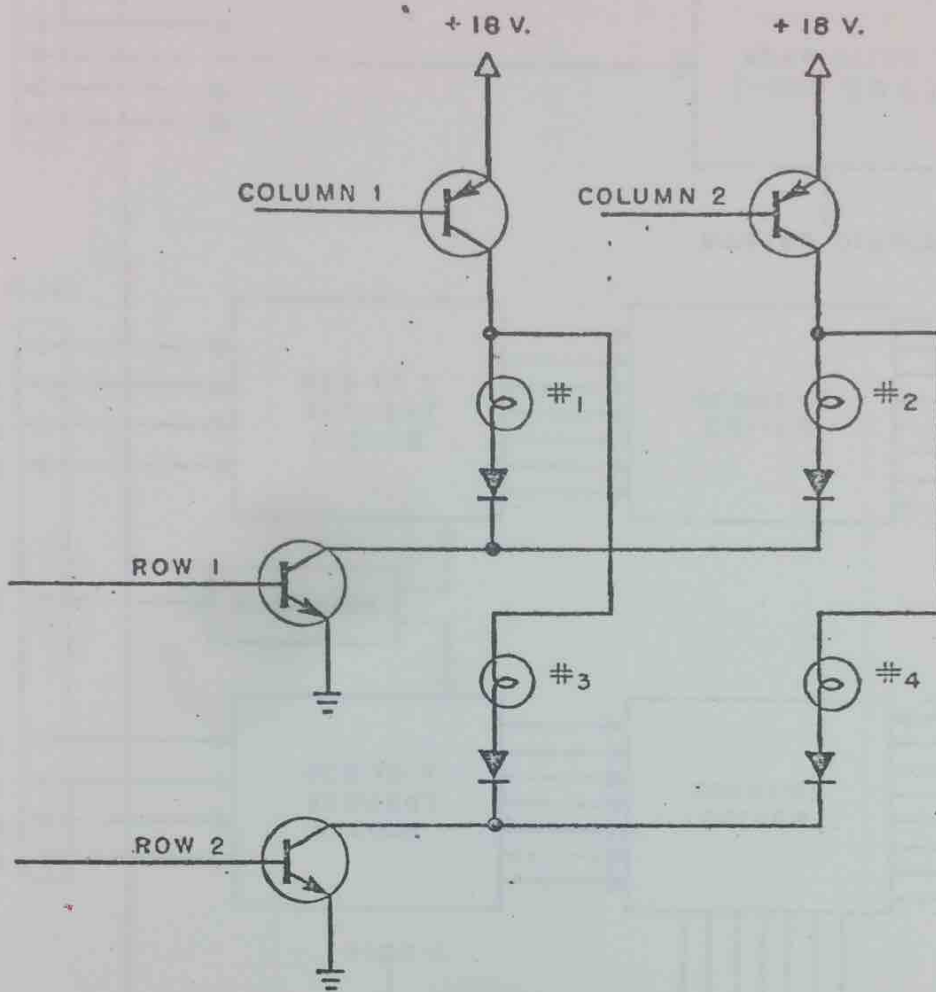
Attorneys for Defendant
Williams Electronics, Inc.

November 14, 1978

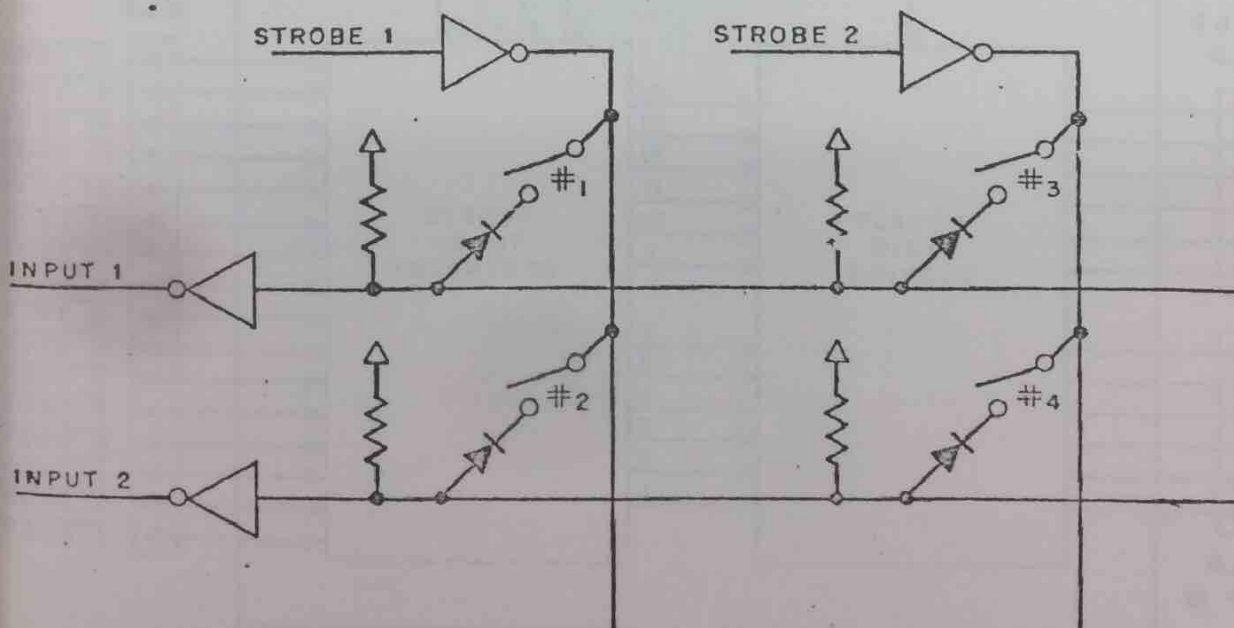




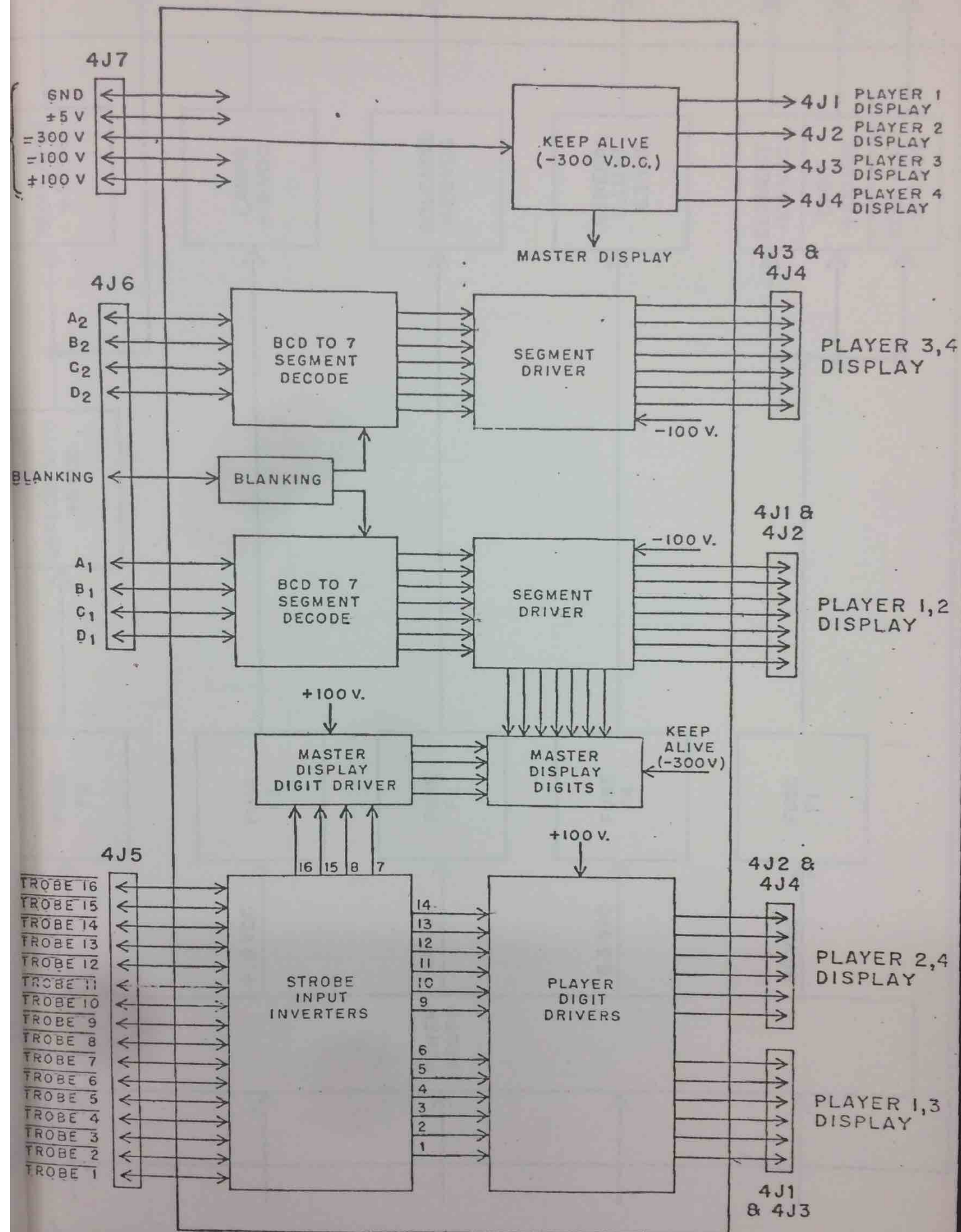
SIMPLIFIED LAMP MATRIX

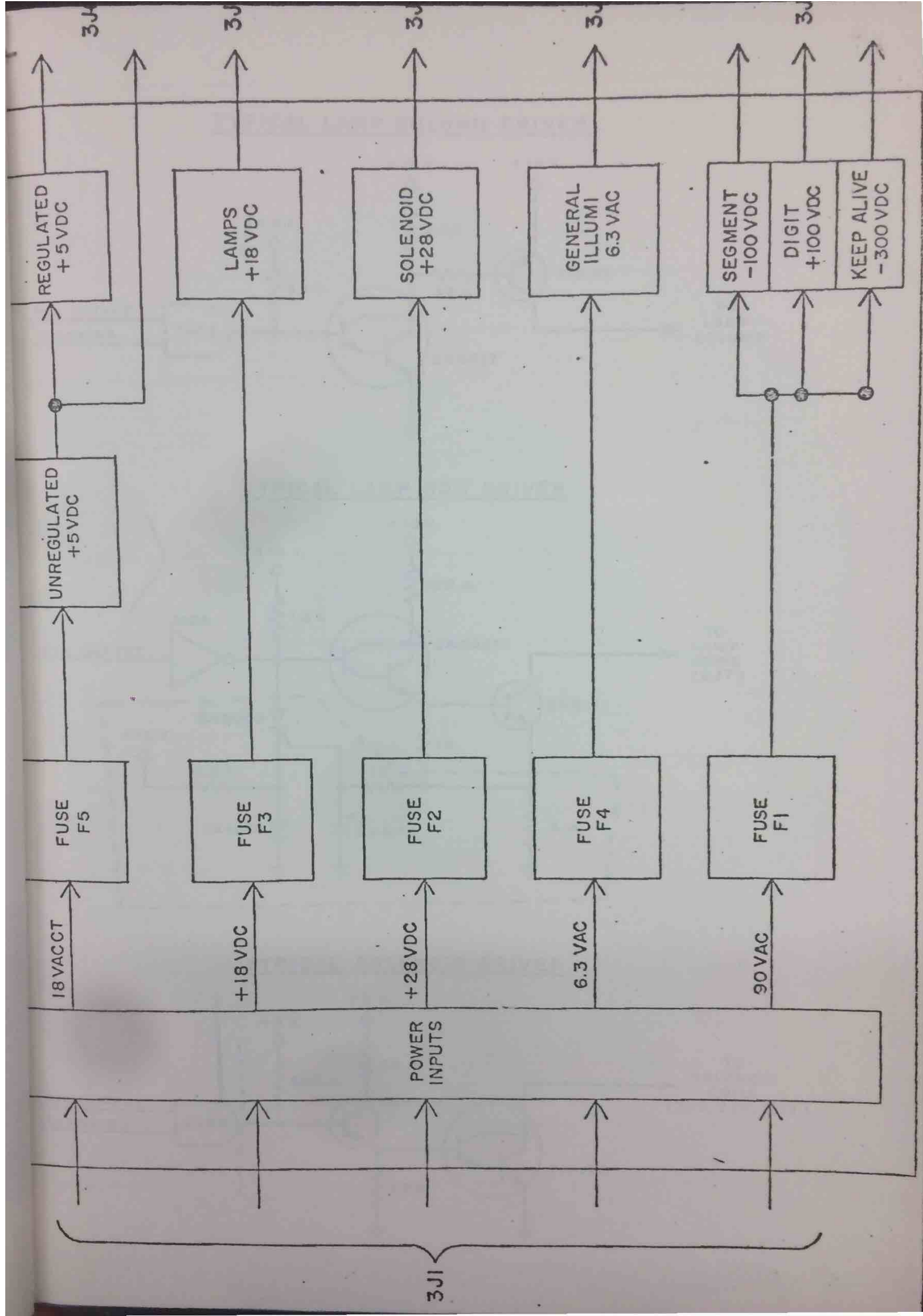


SIMPLIFIED SWITCH MATRIX

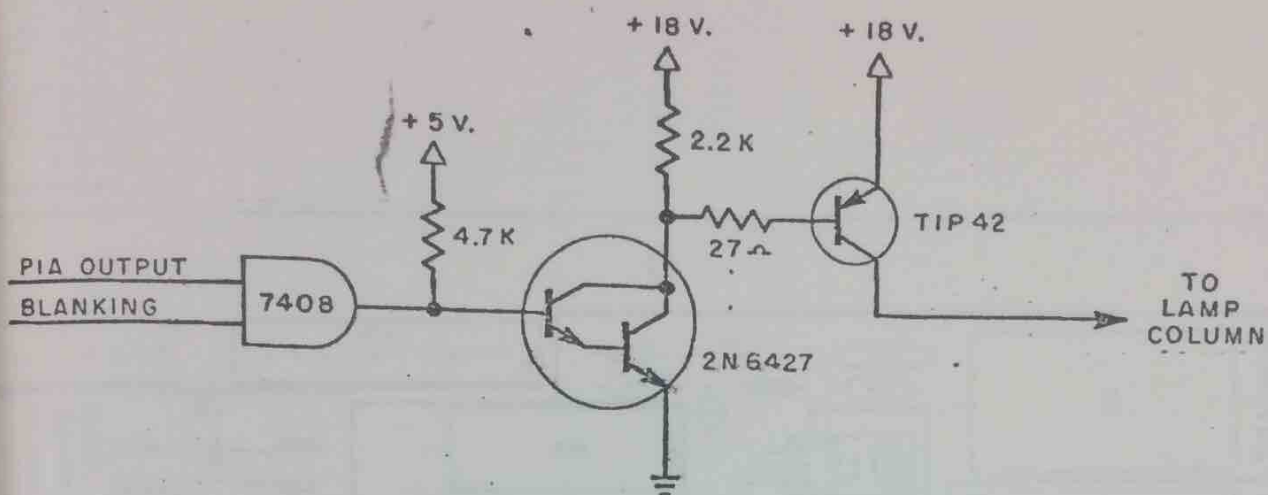


MASTER DISPLAY BLOCK DIAGRAM

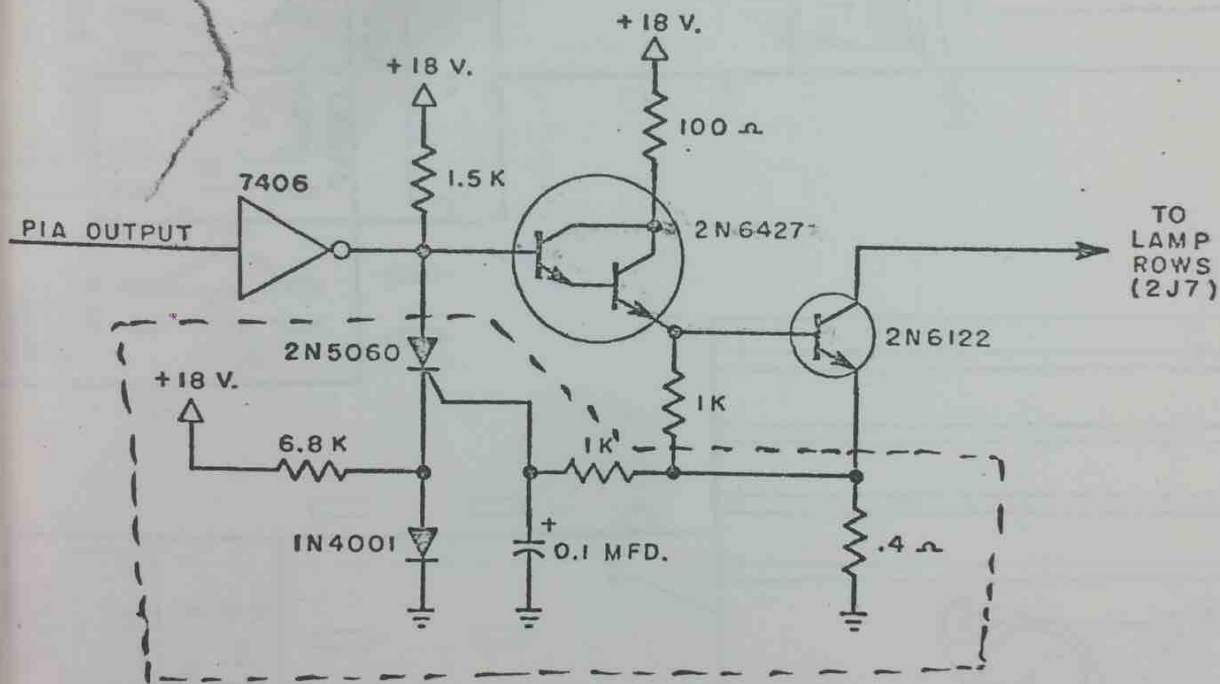




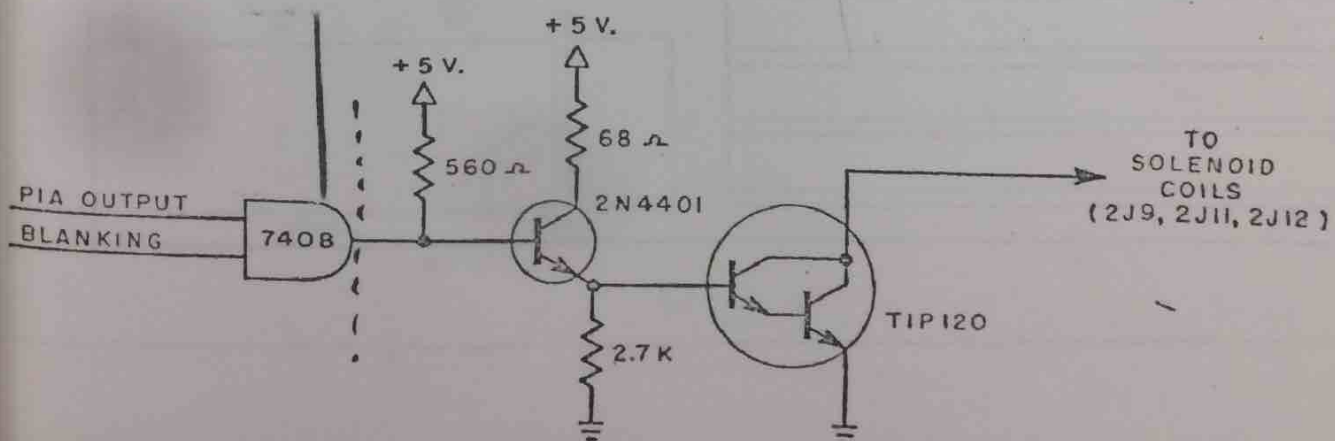
TYPICAL LAMP COLUMN DRIVER

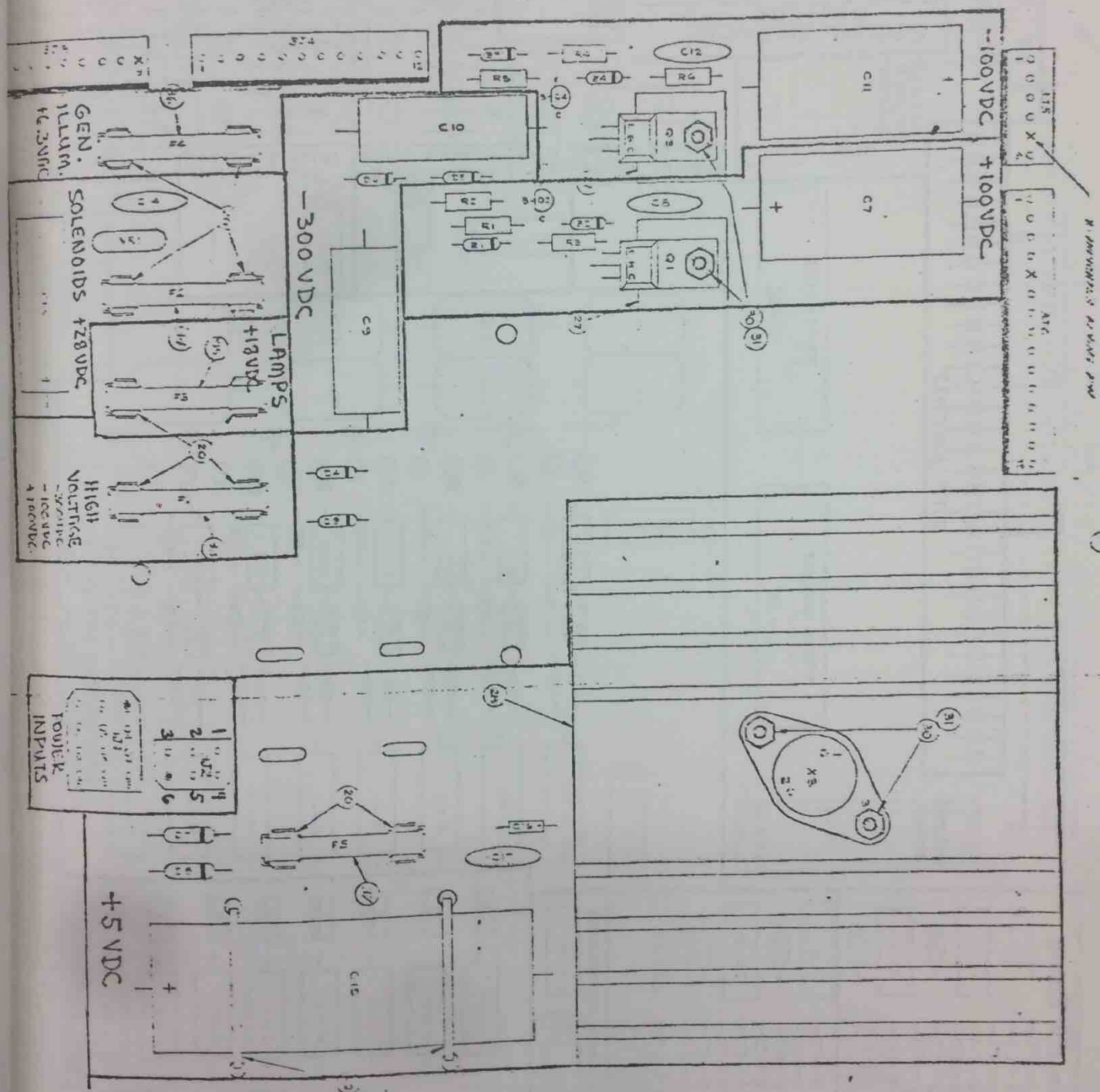


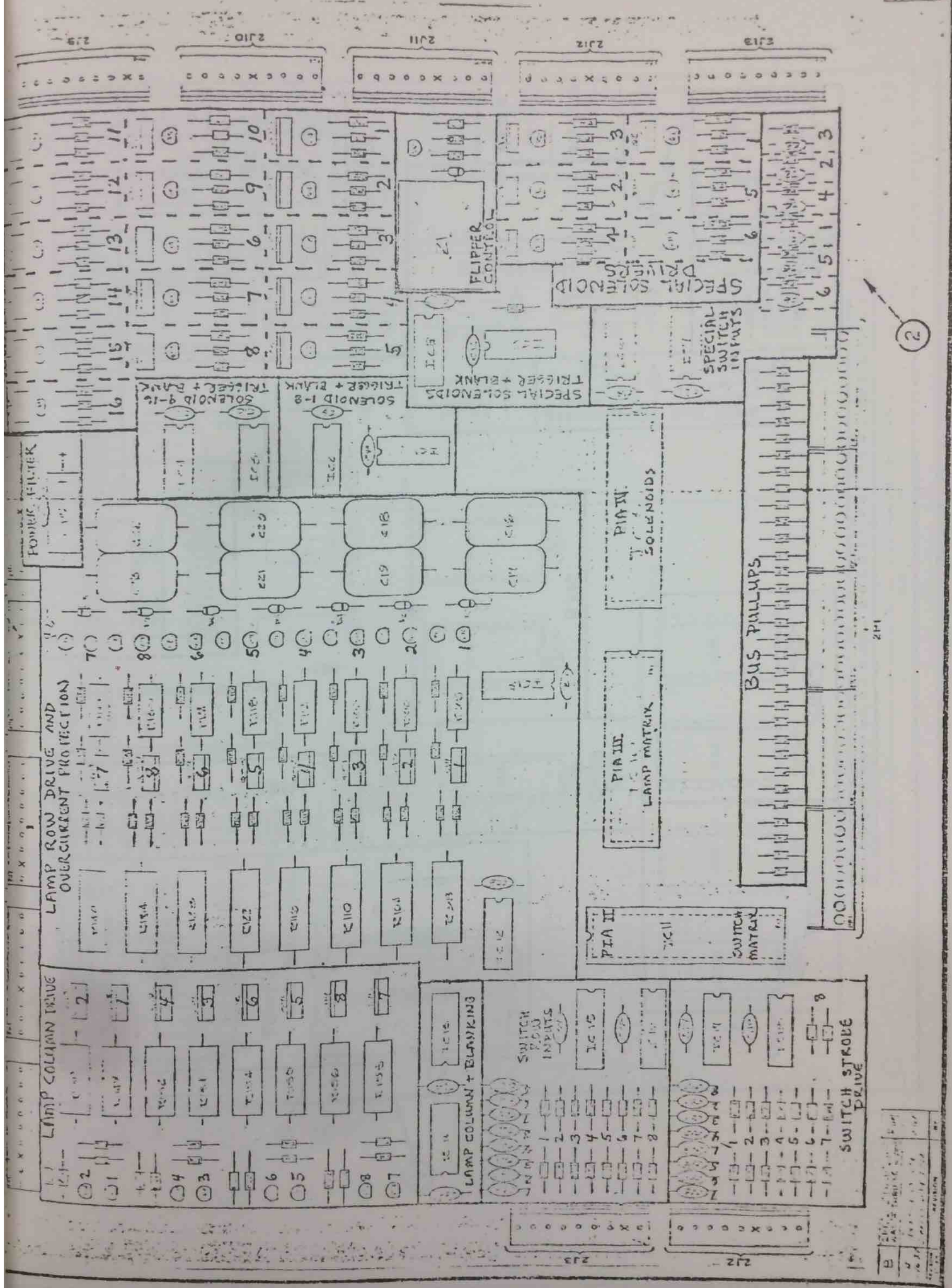
TYPICAL LAMP ROW DRIVER



TYPICAL SOLENOID DRIVER



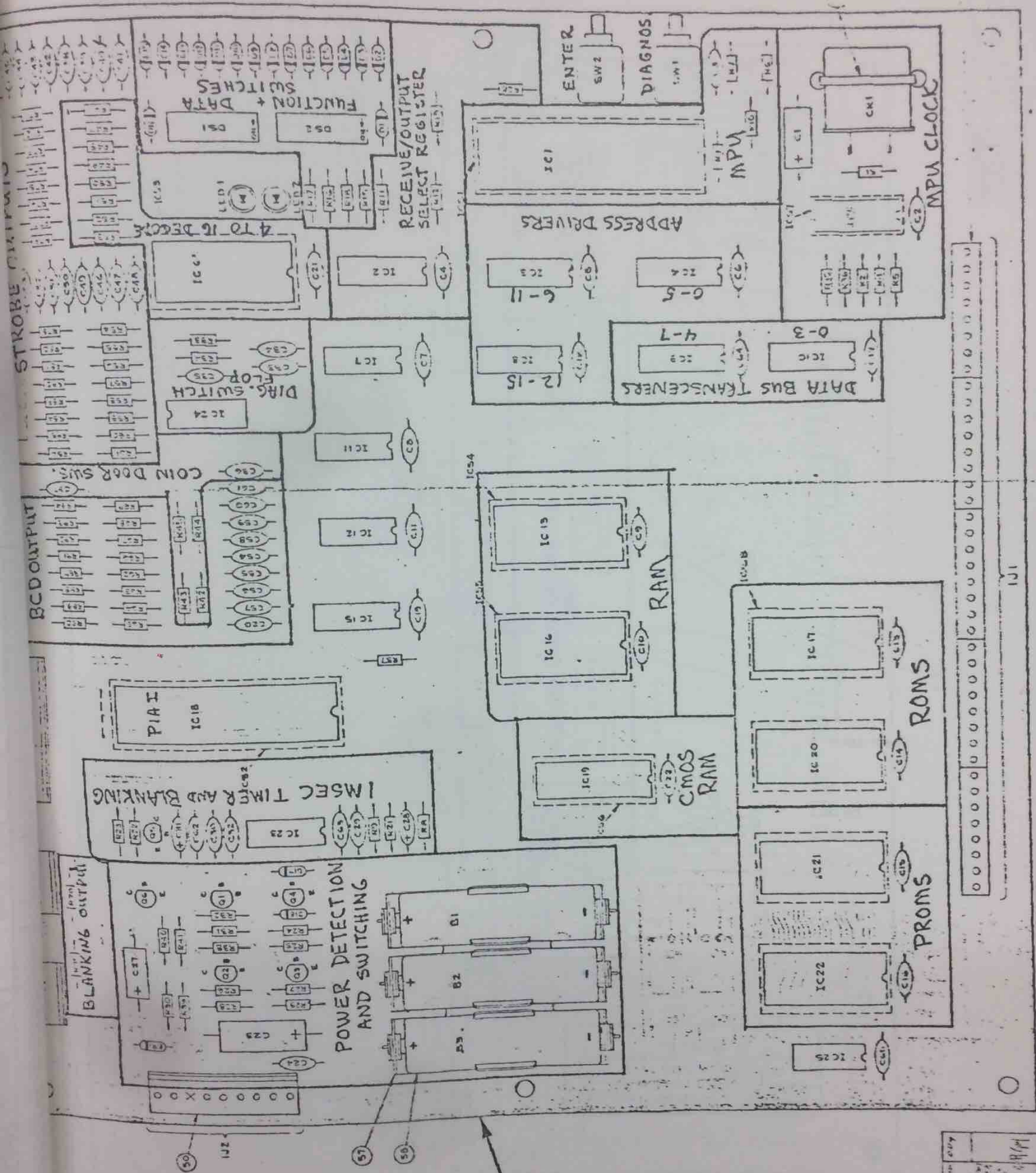




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4 ma @ 500 Hz

NOTE 1

1. ALL COMPONENTS SHOWN WITH TOLERANCES AND RATING
UNLESS OTHERWISE SPECIFIED.
2. ALL COMPONENTS SHOWN WITH TOLERANCES AND RATING
UNLESS OTHERWISE SPECIFIED.
3. ALL COMPONENTS SHOWN WITH TOLERANCES AND RATING
UNLESS OTHERWISE SPECIFIED.

LIST OF MATERIAL

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